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Food and Drug Administration
Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

9053 '99 JUL 28 A10:28

July 23, 1999

Re: Docket Nos: 98N-1230; 96P-0418; 97P-O197

To whom it may concern,

I am submitting comments on the above Docket numbers concerning reducing egg-borne diseases caused by contaminated eggs. I am vehemently opposed to the practice of forced molting.

Because the Food and Drug Administration (FDA) has jurisdiction to ban farm practices, such as forced molting, that injure human health, and because forced molting of laying hens is a primary cause of infectious diseases in hens, eggs, and consumers of eggs, I am writing to demand that the FDA (and the USDA) ban forced molting, in the interest of public health and animal welfare.

Each year the US egg industry force molts--intentionally starves for up to 14 days--millions of hens to manipulate egg production. Forced molting is so stressful it destroys the hens' immune systems, predisposing the birds and their eggs to *Salmonella* poison. The US Dept of Agriculture's Food Safety & Inspection Service (FSIS) stated: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of *Salmonella enteritidis* (Se) by laying hens subjected to these practices."

- FDA must do more than put bacteria warning labels on egg cartons and regulate egg refrigeration temperatures.
- FDA should prohibit the practice of forced molting because forced molting has been scientifically shown to promote disease by destroying the starving hens' immune systems.
- FDA was petitioned in April 1998 to ban forced molting. This petition should be granted without further delay.

Sincerely,



Emily A. Fano, MA

96P-0418

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Board and Drug Administration
 Hockey Management Branch (HMB)
 5630 Fishers Lane, Room 106
 Rockville, MD 20852

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**HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION
CROSS REFERENCE SHEET**

Docket Number/Item Code: 98N-1230/C 2

See Docket Number/Item Code: 96P-0418/C 2
97P-0197/C 3